James E. Cecchi Lindsey H. Taylor CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C. 5 Becker Farm Road Roseland, New Jersey 07068 (973) 994-1700

George K. Lang FREED & WEISS LLC 111 West Washington Street, Suite 1331 Chicago, Illinois 60602 (312) 220-0000

Richard J. Burke FREED & WEISS LLC 1010 Market Street, Suite 660 St. Louis, Missouri 63101 (314) 770-8000 Steven A. Schwartz Alison R. Gabe CHIMICLES & TIKELLIS LLP One Haverford Centre 361 W. Lancaster Avenue Haverford, PA 19041 (610) 642-8500

Oren Giskan GISKAN SOLOTAROFF ANDERSON & STEWART 11 Broadway, Suite 2150 New York, New York 10004 (212) 847-8315

James C. Shah Natalie Finkelman Bennett SHEPHERD, FINKELMAN, MILLER & SHAH, LLP 457 While Horse Pike Collingswood, New Jersey 08107 (856) 858-1770

Attorneys for Plaintiffs

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE LG FRONT LOADING WASHING MACHINE CLASS ACTION LITIGATION

Civil Action No. 08-51(FSH)(MAS)

## **NOTICE OF MOTION**

To: All Counsel on ECF Mailing List

COUNSEL:

PLEASE TAKE NOTICE that in accordance with the schedule set forth in the Court's Amended Pretrial Scheduling Order dated August 9, 2010, the undersigned counsel for Plaintiffs shall move before Hon. Faith S. Hochberg, U.S.D.J. at the United States Post Office and Courthouse Building, for class certification in accordance with Fed.R.Civ.P. 23.

The undersigned intend to rely upon the annexed Brief and exhibits annexed thereto, Compendium of Plaintiffs' Deposition Excerpts, Compendium of Plaintiffs' Declarations, and Trial Plan.

The undersigned hereby requests oral argument.

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C. Counsel for Plaintiffs

BY: /s/ James E. Cecchi
JAMES E. CECCHI

Dated: March 30, 2011